## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA ex rel. ROBERT A. CUTLER,

Plaintiff,

v.

CIGNA CORPORATION, CIGNA
HOLDINGS, INC., CONNECTICUT
GENERAL CORP., HEALTHSPRING, INC.,
NEW QUEST LLC, HEALTHSPRING LIFE &
HEALTH INSURANCE COMPANY, INC.,
GULF QUEST LP, PHYSICIANS
MANAGEMENT LLC, and ALEGIS CARE
SERVICES, LLC,

Defendants.

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

THE CIGNA GROUP, BRAVO HEALTH MID-ATLANTIC, INC., BRAVO HEALTH PENNSYLVANIA, INC., CIGNA HEALTH & LIFE INS. CO., CIGNA HEALTHCARE OF CALIFORNIA, INC., CIGNA HEALTHCARE OF COLORADO, INC., CIGNA HEALTHCARE OF CONNECTICUT, INC., CIGNA HEALTHCARE OF GEORGIA, INC., CIGNA HEALTHCARE OF NORTH CAROLINA, INC., CIGNA HEALTHCARE OF SOUTH CAROLINA, INC., CIGNA HEALTHCARE OF ST. LOUIS, INC., HEALTHCARE OF ST. LOUIS, INC., and HEALTHSPRING OF FLORIDA, INC., and HEALTHSPRING LIFE & HEALTH INS. CO.,

Defendants.

Case No. 3:21-cv-00748
JUDGE RICHARDSON
MAGISTRATE JUDGE FRENSLEY

### JOINT MOTION TO ENTER PROPOSED SETTLEMENT STIPULATIONS

For the reasons stated during the status conference held earlier today, the Parties, by and through counsel, jointly move the Court to enter the proposed (i) Stipulation and Order of Settlement and Dismissal and (ii) Stipulation and Order of Settlement and Release Between the United States and Relator, which are attached to this Motion.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/ Samuel Dolinger

JEAN-DAVID BARNEA (pro hac vice)
PETER ARONOFF (pro hac vice)
SAMUEL DOLINGER (pro hac vice)
Assistant United States Attorneys
86 Chambers Street, 3rd Floor
New York, New York 10007
Tel.: (212) 637-2679/2697/2677
jean-david.barnea@usdoj.gov
peter.aronoff@usdoj.gov
samuel.dolinger@usdoj.gov

HENRY C. LEVENTIS United States Attorney for the Middle District of Tennessee

By: /s/ Ellen Bowden McIntyre
ELLEN BOWDEN MCINTYRE
Assistant United States Attorney
719 Church Street, Suite 3300
Nashville, Tennessee 37203
Tel.: (615) 736-5151
ellen.bowden2@usdoj.gov

Counsel for the United States of America

#### THE SWAFFORD LAW FIRM, PLLC

By: /s/ Tara L. Swafford

Tara L. Swafford W. Lee Maddux Elizabeth G. Hart 321 Billingsly Court, Suite 19 Franklin, TN 37067 Tel.: (615) 599-8406 tara@swaffordlawfirm.com lee.maddux@arlaw.com betsy@swaffordlawfirm.com

Counsel for Relator

# WILMER, CUTLER & PICKERING HALE AND DORR LLP

By: /s/ David W. Ogden

David W. Ogden (pro hac vice)
Howard M. Shapiro (pro hac vice)
Charles C. Speth (pro hac vice)
Kevin M. Lamb (pro hac vice)
WILMER CUTLER PICKERING
HALE & DORR LLP
2100 Pennsylvania Avenue NW
Washington, DC 20037
Telephone: (202) 663-6440

Thomas K. Potter, III (TN Bar No. 024857)
J. Alex Little (TN Bar No. 029858)
BURR & FORMAN LLP
222 Second Avenue South, Suite 2000
Nashville, TN 37201

Counsel for Defendants

#### **CERTIFICATE OF SERVICE**

I certify that copies of the foregoing and the attached proposed stipulations were served on September 29, 2023, by electronic means via the Court's electronic filing system, to the following:

Tara L. Swafford W. Lee Maddux Elizabeth G. Hart The Swafford Law Firm, PLLC 321 Billingsly Court, Suite 19 Franklin, TN 37067 tara@swaffordlawfirm.com lee.maddux@arlaw.com betsy@swaffordlawfirm.com

David W. Ogden
Howard M. Shapiro
Charles Speth
Kevin Lamb
Wilmer, Cutler & Pickering Hale and Dorr LLP
1875 Pennsylvania Avenue NW
Washington, DC 20006
david.ogden@wilmerhale.com
howard.shapiro@wilmerhale.com
charles.speth@wilmerhale.com
kevin.lamb@wilmerhale.com

Thomas K. Potter, III
J. Alex Little
Burr & Forman, LLP
222 Second Avenue South, Suite 2000
Nashville, TN 37201
alex.little@burr.com
tpotter@burr.com

/s/ Samuel Dolinger
SAMUEL DOLINGER